

Honorable Judge Benjamin Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

Pursuant to 28 U.S.C. § 1746, Kathleen T. Zellner declares under penalty of perjury
under the laws of the State of Washington and the United States of America that the following
is true and accurate:

1) I am the attorney of record for Plaintiff Clyde Ray Spencer in the above entitled action. I am competent to testify in all respects, and make this declaration from personal knowledge.

2) Attached to this Declaration as Exhibit A is an email, dated October 8, sent by my office to opposing counsel regarding the proposed trial deposition of Dr. Link.

DECLARATION OF KATHLEEN T. ZELLNER IN SUPPORT
OF PLAINTIFF'S REPLY IN SUPPORT OF MOTION FOR
LEAVE TO TAKE TRIAL DEPOSITION (C11-5424BHS) — 1

Kathleen T. Zellner & Associates, P.C.
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3) Attached to this Declaration as Exhibit B is an email, dated October 9, sent by counsel for Defendant Krause, Guy Bogdanovich, regarding the proposed trial deposition of Dr. Link.

4) Attached to this Declaration as Exhibit C is an email, dated October 9, sent by counsel for Defendant Davidson, Jeff Freimund, regarding the proposed trial deposition of Dr. Link.

5) Attached to this Declaration as Exhibit D is an email, dated October 24, sent by my office to opposing counsel regarding the proposed trial deposition of Menona Landrum.

6) Attached to this Declaration as Exhibit E is an email, dated October 29, sent by counsel for Defendant Krause, Guy Bogdanovich, regarding the proposed trial deposition of Menona Landrum.

7) Attached to this Declaration as Exhibit F is a true and correct redacted copy of the Clark County District Court Docket in Case No. 205066D CKP.

SIGNED this 20th day of November, 2013 in Downers Grove, Illinois.

Respectfully submitted,

/s/ Kathleen T. Zellner

Kathleen T. Zellner & Associates, P.C.
Admitted *pro hac vice*
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Attorney for Plaintiffs

DECLARATION OF SERVICE

I hereby certify that on November 20, 2013, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the attorneys of record as follows:

Guy Bogdanovich Law, Lyman, Daniel, Kamerrer & Bogdanovich, P.S. P.O. Box 11880 Olympia, WA 98508-1880 Email: gbogdanovich@lldkb.com Attorney for Defendant Sharon Krause	Jeffrey A. O. Freimund Freimund Jackson Tardif & Benedict Garratt, PLLC 711 Capitol Way South, Suite 602 Olympia, WA 98502 Email: jeffF@fjtlaw.com Attorneys for Defendant Michael Davidson
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/s/ Kathleen T. Zellner

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